

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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In re: NEURONTIN MARKETING AND	:	
SALES PRACTICES LITIGATION	:	
-----	X	MDL Docket No. 1629
	:	
THIS DOCUMENT RELATES TO:	:	Master File No. 04-10981
	:	
-----	X	Judge Patti B. Saris
	:	
HARDEN MANUFACTURING CORPORATION;	:	
LOUISIANA HEALTH SERVICE INDEMNITY COMPANY,	:	
dba BLUECROSS/BLUESHIELD OF LOUISIANA; UNION	:	
OF OPERATING, LOCAL NO. 68 WELFARE FUND;	:	
ASEA/AFSCME LOCAL 52 HEALTH BENEFITS TRUST;	:	
GERALD SMITH; and LORRAINE KOPA, on behalf of	:	
themselves and all others similarly situated, v. PFIZER INC. and	:	
WARNER-LAMBERT COMPANY.	:	
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MOTION TO DISMISS

Defendants Pfizer Inc. and Warner-Lambert Company ("Defendants") respectfully move, pursuant to Rules 12(b)(6) and 9(b) of the Federal Rules of Civil Procedure, to dismiss the Amended Class Action Complaint.

The grounds for this motion are set forth in the accompanying Memorandum of Law of Pfizer Inc. and Warner-Lambert Company in Support of Their Motions to Dismiss the Amended Class Action Complaint and the First Coordinated Amended Complaint (the "Memorandum of Law").

In support of this motion, Defendants submit the Memorandum of Law and a Declaration of David B. Chaffin.

WHEREFORE, Defendants respectfully request that the Court dismiss the Amended Class Action Complaint.

REQUEST FOR ORAL ARGUMENT

Defendants believe that oral argument may assist the Court and wish to be heard. They therefore request oral argument on this motion on June 1, 2005, as previously scheduled by the Court.

Dated: March 17, 2005

DAVIS POLK & WARDWELL

By: /s/James P. Rouhandeh
James P. Rouhandeh

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- and -

HARE & CHAFFIN

By: /s/David B. Chaffin
David B. Chaffin

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Attorneys for Defendants Pfizer Inc. and Warner-Lambert Company

CERTIFICATE OF CONSULATION

I certify that counsel have conferred and attempted in good faith to resolve or narrow the issue presented by this motion.

/s/David B. Chaffin